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May 5, 2017

Ms. Lisa J. Stevenson  
Acting General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

**Re: Response to March 20, 2017 Letter and Request for Pre-Probable  
Cause Conciliation – MUR 7221 (Christopher Stecher)**

Dear Ms. Stevenson:

We write on behalf of our client Christopher Stecher in response to the Commission's letter dated March 20, 2017. Mr. Stecher respectfully requests that the Commission engage in pre-probable cause conciliation to resolve this matter.

The Commission's letter of March 20, 2017 included a letter from the Commission dated October 6, 2014 containing allegations related to a political contribution reimbursement program, but Mr. Stecher did not receive that 2014 letter. He has moved four times in the last five years and the Commission's letter did not reach him.

Nevertheless, although Mr. Stecher did not receive the Commission's 2014 letter prior to notice of the Commission's reason to believe finding, this matter can now be promptly and efficiently resolved through pre-probable cause conciliation. Pursuant to the Office of General Counsel's Enforcement Manual, pre-probable cause conciliation is appropriate where further investigation is not necessary, the facts are sufficient to establish a violation of the Act, and it is likely the respondent and Commission can agree on the violation and facts. See *FEC, Guidebook for Complainants and Respondents on the FEC Enforcement Process* 14, 16-17 (May 2012); *FEC, OGC Enforcement Manual* 77 (June 2013). All of these factors are present here. Given the extensive document productions that have already taken place (over 8,000 pages produced), further investigation is not necessary. Moreover, the facts as reflected in those productions are likely sufficient to establish a violation of the Act (but not a knowing and willful one). And Mr. Stecher believes that it is likely that he and the Commission can agree on the violation and facts.

## COVINGTON

Ms. Lisa J. Stevenson  
May 5, 2017  
Page 2

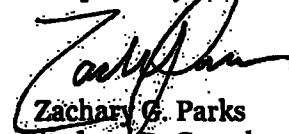
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Entering into pre-probable cause conciliation would also be consistent with the Commission's practice in these matters. The Commission regularly enters into pre-probable cause conciliation in contribution in the name of another cases, especially with subordinate employees who, like Mr. Stecher, acted at the direction of their employers in making reimbursed political contributions. *See, e.g.*, MUR 5041 (Wuesthoff Memorial Hospital) Conciliation Agreements of Rebecca Colker (Feb. 21, 2001) and Terence Murphy (May 4, 2001); MUR 5305 (Herrera for Congress) Conciliation Agreement of Nadine Giudicessi and James A. Bevan (Sept. 30, 2005); MUR 5453 (Giordano for United States Senate) Conciliation Agreement of William Wittman (Dec. 5, 2005). Even after finding reason to believe that the alleged violation was knowing and willful—a finding the Commission did not make with respect to Mr. Stecher—the Commission has agreed to pre-probable cause conciliation. *See, e.g.*, MUR 5405 (Hynes for Senate) Conciliation Agreement (Apr. 27, 2005); MUR 5453 (Giordano for United States Senate) Willsey Conciliation Agreement (Oct. 12, 2005); MUR 5366 (Edwards for President/Tab Turner) Turner Conciliation Agreement (June 21, 2006).

Accordingly, because Mr. Stecher's case is not materially different from the many other matters in which the Commission has approved pre-probable cause conciliation for employee conduits and because the factors the Commission considers when assessing whether to enter into pre-probable cause conciliation are present here, pre-probable cause conciliation is appropriate here.

Mr. Stecher would be pleased to consider any requests from the Commission for additional information that might assist it in resolving this matter through pre-probable cause conciliation.

Respectfully Submitted,



Zachary G. Parks  
Andrew D. Garrahan  
COVINGTON & BURLING LLP

*Counsel to Christopher Stecher*

cc: Ms. Jin Lee  
Mr. Nicholas Mueller